

Message

From: Hence, Kia [hence.kia@epa.gov]
Sent: 5/4/2017 1:47:23 PM
To: Gibson, Benjamin [gibson.benjamin@epa.gov]
CC: Chow, Alice [chow.alice@epa.gov]; Hyden, Loretta [Hyden.Loretta@epa.gov]; Palma, Elizabeth [Palma.Elizabeth@epa.gov]; Pino, Maria [Pino.Maria@epa.gov]; Casso, Ruben [Casso.Ruben@epa.gov]
Subject: RE: May 2016 Fort McMurray Maryland Exceptional Event Demonstration - Draft

Thanks Ben,

I forwarded your email to MDE.

From: Gibson, Benjamin
Sent: Thursday, May 04, 2017 9:46 AM
To: Hence, Kia <hence.kia@epa.gov>
Cc: Chow, Alice <chow.alice@epa.gov>; Hyden, Loretta <Hyden.Loretta@epa.gov>; Palma, Elizabeth <Palma.Elizabeth@epa.gov>; Pino, Maria <Pino.Maria@epa.gov>; Casso, Ruben <Casso.Ruben@epa.gov>
Subject: RE: May 2016 Fort McMurray Maryland Exceptional Event Demonstration - Draft

Kia,

I believe the table below is correct except for the CASTNET monitors (I just sent a background note on why they principally *can* be included).

That said, as you probably already know, the Blackwater monitor for May 25 cannot be considered in the demo, not because it is CASTNET, but because the monitor concentration is not an exceedance, nor does it result in a violating design value.

From the 2016 EER preamble: "If the elevated concentration is not itself an exceedance nor does it result in a violating design value, then the value in question could not be considered as an exceptional event."

In other words, the Blackwater monitor for May 25 could be considered in one of two ways: 1) The monitor reading was 71 or higher, or 2) The monitor-day concentration was below 71 but the corresponding DV including the event day was 71 or higher *and* the monitor-day concentration was one of fourth-highest values for the year (i.e., influenced the violating DV).

Happy to discuss if you'd like!

Ben

From: Hence, Kia
Sent: Wednesday, May 03, 2017 12:11 PM
To: Joel Dreessen -MDE- <joel.dreessen@maryland.gov>
Cc: Michael Woodman -MDE- <Michael.woodman@maryland.gov>; Jennifer Hains <jennifer.hains@maryland.gov>; Chow, Alice <chow.alice@epa.gov>; david.krask@maryland.gov; Hyden, Loretta <Hyden.Loretta@epa.gov>; Gibson, Benjamin <gibson.benjamin@epa.gov>; Palma, Elizabeth <Palma.Elizabeth@epa.gov>; Pino, Maria <Pino.Maria@epa.gov>
Subject: RE: May 2016 Fort McMurray Maryland Exceptional Event Demonstration - Draft

Hi Joel,

I thought it might be more clear if answered your questions by addressing each of the monitors on the table below. Please see my comments in the last two columns. In case I stated anything incorrectly, I've copied Ben, Beth (OAQPS) and Maria (R3 Planning Group) on this email. I struck through and grayed out the monitors (or dates) that shouldn't be requested for data exclusion in the demonstration based on the criteria in 40 CFR 50.14(a)(1)(i):

"This section applies to the treatment of data showing exceedances or violations of any national ambient air quality standard for purposes of the following types of regulatory determinations by the Administrator:..."

AQS SITE CODE	Site Name	2016: 4th Maximum (Including May EE)	MD8AO (rank)		2016 Design Value (including May EE)	2016 Design Value (excluding May EE)	EPA R3 Comment	Potential Regulatory Determination
			May 25, 2016	May 26, 2016				
24-025-9001	ALDINO	0.077	77 (3)	79 (2)	0.073	0.073	Eligible for a data exclusion request. Meets criteria by having exceedances greater than 70ppb (i.e. ≥ 71 ppb).	Excluding the even value still violates. Not aware of any regulatory decision for this monitor concerning O ₃ NAAQS.
24-033-9994	BELTSVILLE CASNET	0.070	76 (2)	72 (3)	0.068	0.068	These monitors are part of the CA. Only request data exclusion for the MDE's ambient air monitoring network.	
24-019-9994	BLACKWATER NWR CASTNET	0.068	70 (3)	76 (1)	0.066	0.065		
24-009-0011	CALVERT	0.070	70 (4)	75 (1)	0.069	0.068	Eligible <u>only</u> for a data exclusion request for the exceedance on 5/26/16. The measured concentration on 5/25/16 is not an exceedance since it is not greater than 70ppb (i.e. ≥ 71 ppb).	Including the even value is below the therefore no violation. any regulatory decisions/determinations concerning NAAQS.

24-025-1001	EDGEWOOD	0.079	79 (4)	80 (2)	0.073	0.073	Eligible for a data exclusion request. Meets criteria by having exceedances greater than 70ppb (i.e. ≥ 71 ppb).	Excluding the even value still violates NAAQS. Not aware of any regulatory decisions/determinations for this monitor concerning O ₃ NAAQS.
24-005-3001	ESSEX	0.078	78 (4)	81 (2)	0.072	0.072	Eligible for a data exclusion request. Meets criteria by having exceedances greater than 70ppb (i.e. ≥ 71 ppb).	Excluding the even value still violates NAAQS. Not aware of any regulatory decisions/determinations for this monitor concerning O ₃ NAAQS.
24-015-0003	FAIR HILL	0.080	83 (2)	76 (5)	0.076	0.074	Eligible for a data exclusion request. Meets criteria by having exceedances greater than 70ppb (i.e. ≥ 71 ppb).	2008 O₃ NAAQS P attainment determin Not aware of any regulatory decisions/determinations for this monitor concerning O ₃ NAAQS.
24-021-0037	FREDERICK	0.070	70 (4)	65 (8)	0.067	0.066	Not eligible for a data exclusion request. Doesn't meet exceedance criteria of greater than 70ppb (i.e. ≥ 71 ppb).	Including the even value is below the NAAQS therefore no violation. Not aware of any regulatory decisions/determinations for this monitor concerning O ₃ NAAQS.
24-510-0054	FURLEY	0.075	75 (4)	78 (2)	0.069	0.066	Eligible for a data exclusion request. Meets criteria by having exceedances greater than 70ppb (i.e. ≥ 71 ppb).	Including the even value is below the NAAQS therefore no violation. Not aware of any regulatory decisions/determinations for this monitor concerning O ₃ NAAQS.
24-003-1003	GLEN BURNIE	0.076	75 (6)	76 (4)	0.076	0.076	Eligible for a data exclusion request. Meets criteria by having	Excluding the even value still violates NAAQS. Not aware of any regulatory decisions/determinations for this monitor concerning O ₃ NAAQS.

							exceedances greater than 70ppb (i.e. ≥71ppb).	
24-043-0009	HAGERSTOWN	0.070	68 (5)	61(18)	0.066	0.066	Not eligible for a data exclusion request. Doesn't meet exceedance criteria of greater than 70ppb (i.e. ≥71ppb).	Including the even value is below the there is no violation any regulatory decisions/determin monitor concerning NAAQS.
24-019-0004	HORN POINT	0.067	71 (2)	77 (1)	0.064	0.064	Eligible for a data exclusion request. Meets criteria by having exceedances greater than 70ppb (i.e. ≥71ppb).	Including the even value is below the there is no violation any regulatory decisions/determin monitor concerning NAAQS.
24-033-0030	HOWARD U	0.070	74 (2)	74 (2)	0.069	0.068	Eligible for a data exclusion request. Meets criteria by having exceedances greater than 70ppb (i.e. ≥71ppb).	Including the even value is below the there is no violation any regulatory decisions/determin monitor concerning NAAQS.
24-029-0002	MILLINGTON	0.072	85 (1)	76 (2)	0.070	0.069	Eligible for a data exclusion request. Meets criteria by having exceedances greater than 70ppb (i.e. ≥71ppb).	Including the even value is below the there is no violation any regulatory decisions/determin monitor concerning NAAQS.
24-005-1007	PADONIA	0.073	74 (3)	84 (1)	0.072	0.072	Eligible for a data exclusion request. Meets criteria by having exceedances greater than 70ppb (i.e. ≥71ppb).	Excluding the even value still violates Not aware of any regulatory decision for this monitor cor O ₃ NAAQS.

24-033-8003	PG EQ CENTER	0.076	74 (5)	69 (8)	0.071	0.071	Eligible <u>only</u> for a data exclusion request for the exceedance on 5/25/16. The measured concentration on 5/26/16 is not an exceedance since it is not greater than 70ppb (i.e. ≥ 71 ppb).	Excluding the even value still violates. Not aware of any regulatory decisions/determinations to monitor concerning NAAQS.
24-023-0002	PINEY RUN	0.066	64 (7)	53 (4)	0.065	0.065	Not eligible for a data exclusion request. Doesn't meet exceedance criteria of greater than 70ppb (i.e. ≥ 71 ppb).	Including the even value is below the therefore no violation of any regulatory decisions/determinations to monitor concerning NAAQS.
24-031-3004	ROCKVILLE	0.068	69 (2)	67 (6)	0.068	0.068	Not eligible for a data exclusion request. Doesn't meet exceedance criteria of greater than 70ppb (i.e. ≥ 71 ppb).	Including the even value is below the therefore no violation of any regulatory decisions/determinations to monitor concerning NAAQS.
24-013-0001	S. CARROLL	0.072	72 (4)	75 (2)	0.068	0.067	Eligible for a data exclusion request. Meets criteria by having exceedances greater than 70ppb (i.e. ≥ 71 ppb).	Including the even value is below the therefore no violation of any regulatory decisions/determinations to monitor concerning NAAQS.
24-017-0010	S. MARYLAND	0.073	69 (7)	73 (4)	0.070	0.070	Eligible <u>only</u> for a data exclusion request for the exceedance on 5/26/16. The measured	Including the even value is below the therefore no violation of any regulatory decisions/determinations to monitor concerning NAAQS.

						concentration on 5/25/16 is not an exceedance since it is not greater than 70ppb (i.e. ≥ 71 ppb).
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Let me know if you have any questions.

Kia Long

US EPA Region 3
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1650 Arch St.
Philadelphia, PA 19103
(215) 814 - 2111

"We are what we repeatedly do. Excellence then, is not an act, but a habit." - Aristotle

From: Joel Dreessen -MDE- [<mailto:joel.dreessen@maryland.gov>]

Sent: Monday, May 01, 2017 4:24 PM

To: Hence, Kia <hence.kia@epa.gov>

Cc: Michael Woodman -MDE- <Michael.woodman@maryland.gov>; Jennifer Hains <jennifer.hains@maryland.gov>; Chow, Alice <chow.alice@epa.gov>; david.krask@maryland.gov; Hyden, Loretta <Hyden.Lorretta@epa.gov>

Subject: Re: May 2016 Fort McMurray Maryland Exceptional Event Demonstration - Draft

Kia,
Thanks for speaking with us on Friday concerning our draft demonstration of the May event. To follow-up with what we discussed on the call, we would like to clarify which monitors we are allowed to pursue and in what fashion before I start making significant edits.

Based on our conversation, my understanding is that MDE may pursue all monitors that exceeded 70ppb during the event, but only for those particular days. Attached is a table of 16 monitors that had at least 1 exceedance day during the event. Those days we are seeking exclusion for are highlighted in red in the table. There would be 28 data points up for exclusions in this case.

The other criteria for exclusion we discussed was a monitor has a DV above the NAAQS. There are 7 monitors which have a 2016 DV greater than 70ppb, with one (Fair Hill) greater than 75ppb. These are highlighted in orange on the second table. These 7 monitors are already included within the list of monitors which exceeded 70ppb during the event. However, PG EQ Cnt did not exceed 70ppb, but still has a DV above 70ppb. Can we pursue exclusion on both days for that monitor?

Lastly, Maryland was initially pursuing exclusion of all monitors which observed an 8-hour ozone concentration which was one of the top 4 highest of 2016. This would add an additional two monitors for exclusion consideration and an additional 5 data points in total which were not >70ppb but which fall in the top 4 highest observations points of 2016 (data points are colored green in third table). Considering the Exceptional Events Guidance document discusses a Tier 2 demonstration being acceptable based on data being within the fourth highest ranking in a given year, would these 5 additional data points also be considered by EPA as exclusion worthy? These fourth high data points may become important for DVs in 2017 and 2018.

We just wanted to check with you one last time and finalize things before I started making sizable edits to our draft. Thanks for clarifying this for us!

Joel

See attached for tables.

On Wed, Apr 26, 2017 at 8:27 PM, Hence, Kia <hence.kia@epa.gov> wrote:

Ahead of Friday's call I'm attaching EPA's comments for MDE's draft EE demo.

Kia Long

US EPA Region 3

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Philadelphia, PA 19103

(215) 814 - 2111

"We are what we repeatedly do. Excellence then, is not an act, but a habit." - Aristotle

From: Joel Dreessen -MDE- [<mailto:joel.dreessen@maryland.gov>]

Sent: Wednesday, April 05, 2017 12:05 PM

To: Hence, Kia <hence.kia@epa.gov>; joel.dreessen@maryland.gov

Cc: Hyden.lorretta@epa.gov; Chow, Alice <chow.alice@epa.gov>; Michael Woodman -MDE- <Michael.woodman@maryland.gov>; david.krask@maryland.gov; Jennifer Hains <jennifer.hains@maryland.gov>

Subject: May 2016 Fort McMurray Maryland Exceptional Event Demonstration - Draft

MDE has completed a draft demonstration of the May 2016 Fort McMurray fire's impact on ozone concentrations in Maryland on May 25 and 26, 2016. The draft is attached. Thank you for this initial informal review.

Joel

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Publication: [June 2015 Smoke & Ozone Event](#)

[Click here](#) to complete a three question customer experience survey.

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